

PXP BALDWIN HILLS

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# 2011 EQAP AUDIT REPORT

**Marine Research Specialists**

**9/25/2012**

**2011/2012 EQAP AUDIT REPORT****SUMMARY**

This report provides an overview of the 2011 Environmental Quality Assurance Program (EQAP) audit conducted by Marine Research Specialists (MRS) and the LA County Department of Regional Planning on June 13, 2012 at the Plains Exploration and Production (PXP) offices in Los Angeles, California. An initial review of PXP's compliance matrix was conducted by MRS on March 16, 2012.

The audit consisted of both a comprehensive file review of reports, plans, and various documentation logs, as well as a field review of operations and maintenance procedures. Additionally, MRS assessed the implementation status of the previous year's recommendations.

The overall findings of the audit were positive, confirming PXP's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills Community Standards District (CSD). In conducting the 2011 EQAP audit, two recommendations were developed for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. However, since the time of the file and field review, PXP has complied with both of the recommendations, which are listed below.

***Findings/Recommendations***

1. Ombudsperson: Add PXP's time of response to written complaints log in order to provide documentation that PXP responds within 1 hour as specified in the CSD (section J.3);
2. Water Management Plan: Provide an updated plan that identifies the projected water usage numbers. Confirm the same number is reflected in the Recycled Water Report and obtain approval.

**BACKGROUND**

PXP operates the Inglewood Oil Field in the Baldwin Hills Zoned District of Los Angeles County. Existing operations of the oil field include the extraction of oil and gas from subsurface reservoirs, removal of water from the crude oil, removal of impurities and gas liquids from the gas, and shipping of crude oil through pipelines to refineries located in Southern California.

On October 28, 2008, the Los Angeles County Board of Supervisors adopted the Baldwin Hills CSD to provide a means of implementing regulations, safeguards, and controls for activities related to drilling for and production of oil and gas within the oil field located in the Baldwin Hills area of Los Angeles County (PXP 2010 EQAP Report).

The Environmental Quality Assurance Program (EQAP) entails the preparation of an EQAP Program by PXP indicating how PXP intends to comply with all conditions of approval and plans that are part of the CSD (prepared in February 2008, revised in August 2008, and approved on October 28, 2008), field-monitoring to enforce compliance with environmentally protective permit conditions, preparation of an annual EQAP Report by PXP; and finally, a follow up EQAP audit

to document compliance and noncompliance items and provide recommendations as deemed appropriate.

On March 1, 2012, PXP submitted the 2011 Annual EQAP Report as required by the CSD.

On March 16, 2012, MRS conducted an initial review of the 2011 Annual EQAP Report. On June 13, 2012, MRS, along with representatives from LA County and PXP, conducted a comprehensive file and field audit of the 2011 Annual EQAP Report at PXP offices.

EQAP requirements comply with State law that mandates the adoption of a program for reporting or monitoring mitigation measures included as permit conditions for projects (Public Resources Code § 21081.6(a) and CEQA Guidelines §§ 15091(d) and 15097).

## CSD REQUIREMENT

CSD Section F.1 requires PXP to develop and implement the following:

*Environmental Quality Assurance Program (EQAP). The Operator shall comply with all provisions of an Environmental Quality Assurance Program (EQAP) that has been approved by the Director. The following provisions relate to the EQAP:*

- a. *EQAP Requirements. The EQAP shall provide a detailed description of the steps the Operator shall take to assure compliance with all provisions of this section, including but not limited to all of the monitoring programs called for by this section.*
- b. *Annual EQAP Reports. Within 60 days of the end of each calendar year, the Operator shall submit to the Director an annual EQAP report that reviews the Operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the Director. The Annual EQAP Report shall include the following:*
  - *A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis to how compliance with such provisions can be improved over the coming year.*
  - *Results and analyses of all data collection efforts conducted by the Operator over the previous year pursuant to the provisions of this section.*
- c. *EQAP Updates. The EQAP shall be updated as necessary and submitted to the Director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the Director before making a decision to approve the same. The Director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the Operator with a list of specific items that must be included in the EQAP prior to approval. The Operator shall respond to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.*

## AUDIT PARTICIPANTS

Table 1 identifies the individuals who participated in the 2011 EQAP Audit.

**Table 1 – Audit Participants**

NAME	POSITION	ORGANIZATION
Rena Kambara	Regional Planning Assistant	LA County Department of Regional Planning
Ray Mullins	Planning Consultant	Indigo Fakir Consulting
Candace Salway	EH&S Manager	PXP
Pat Gorski	Senior EH&S Advisor	PXP
Laura Vlk	Senior EH&S Specialist	PXP
Lisa Paillet	Ombudsperson	PXP
Luis Perez	Senior Project Manager	MRS
Greg Chittick	Senior Scientist	MRS
Michael Cassata	Senior Planner	MRS

## 2010 RECOMMENDATIONS' STATUS

As a result of the 2010 EQAP Audit, MRS developed five recommendations for potential improvements that would ensure continued compliance with the EQAP-related provisions of the CSD. Table 2 provides the implementation status of those recommendations and Attachment A provides PXP's detailed response letter to the 2010 EQAP Audit recommendations.

**Table 2 – 2010 Recommendations' Status**

RECOMMENDATION	STATUS
1. <b>Vapor Pressure Monitoring &amp; Venting System:</b> Include a bar at the 90-percent mark in the CSD Vapor charts to more easily identify recorded alarms reflected in the daily alarm reports	<b>Not warranted at this time.</b>  Although the recommendation could be implemented, PXP operators are currently notified via page when the tank hatch pressure reaches 90 percent. Following prescribed procedure, operators troubleshoot the operation at the alarm location until the alarm is cleared then document the findings in the daily log. MRS agrees that the real time data reviewed by the operators contains the information necessary for adequate assessment of the vapor pressure levels.
2. <b>Ombudsperson:</b> Add PXP's response time to written complaints log	<b>Implemented.</b>  PXP started documenting the response time in the 2012 2 <sup>nd</sup> quarterly report.
3. <b>What If Analysis:</b> Conduct analysis of loss of power, ESD activation, and maintenance activities to help prevent potential odor events	<b>Not conducted.</b>  PXP states that the current protocols in place provide sufficient measures to reduce the possibility of excess odors under the described scenarios. MRS concurs at this time.
4. <b>Meteorological Station:</b> Analyze whether or not a back-up power source can be	<b>Not warranted at this time.</b>  Based on the third party audit, PXP states there is no

	installed to provide continuous power to the meteorological station during power outages	evidence to substantiate the need for backup since the Met Station’s missing data (1.2 percent) is well below the 10 percent EPA rule. PXP will reconsider the recommendation should subsequent third party audits justify the activity. MRS concurs based on the small percentage of potential missing data.
5.	<b>Noise Monitoring:</b> Reestablish the baseline at Location 2 over a continuous 72-hour period and provide continuous audio recording	<b>Not warranted at this time.</b>  PXP states that since there have been no complaints tied to Location 2, the recommendation is not warranted. Further, all levels detected above the baseline at that location have been confirmed from audio files to have come from sources other than oilfield operations or drilling activities. PXP will reconsider the recommendation should conditions and evidence justify the activity. MRS concurs at this time.

**SITE PHOTOS**

Photos at the end of this report depict various components of the 2011 oil field operations to include:

- Drill Rig
- Workover Rig
- Gas Plant Flare
- Air Monitor
- Signs
- Meteorological Station
- Biofarms & Odorant Equipment
- Noise Monitoring Equipment
- Watering Trucks

The photos were taken either during the EQAP audit field visit or during regular field visits throughout the year.

**SITE VISIT OBSERVATIONS**

Some Observations during the year associated with the weekly Site Visits are listed below:

1. The drill sites throughout the year were consistently clean and organized. Five incidents involving pooling fluids were addressed in a timely manner either by using a vacuum truck or clean up pads. Odorant is routinely used in and around the drill hole and mud shakers to reduce potential drilling odors. The volume of odorant was increased when requested. The portable flare, gas buster, wind socks and alarm lights were routinely installed. Site safety protocols were active with each site visit. The Site Superintendent provided access to real-time data in the Site Superintendent’s trailer when requested.
2. Two air monitors were installed at each drill site throughout the year. THC and H2S levels were consistently within acceptable range; that is, no exceedances were recorded. Recalibrations were completed when requested. Bump tests were provided

upon request by the Site Superintendent. Horn and light alarm repairs were completed when needed.

3. Inglewood Oilfield perimeter signs and drill site signs were installed in accordance with the approved Signage Plan.
4. As stated in the 2011 Meteorological Station Annual Audit and Data Validation, sensors were replaced with newly calibrated sensors in November 2011 as sensor calibration is recommended approximately every twelve months. There were no recorded sensor malfunctions in 2011 nor did any sensors require maintenance or repairs (Audit, 2011). A spot check of training records during the EQAP audit shows training was conducted on January 17, 2011, December 16, 2011 and December 19, 2011.
5. Some small number of data anomalies and gaps throughout the year related to wind speed, temperature values, and solar radiation values at night. These anomalies and gaps were determined to be nominal and are detailed in Table 1 of the 2011 Meteorological Station Annual Audit and Data Validation.
6. Additionally, the 2011 Meteorological Station Annual Audit and Data Validation states that all sensor data was not recorded on nineteen (19) occasions due to power outages for a total of 101 hours. As a result, data gaps were filled with an average between immediately-previous and immediately-following data points. This constitutes a small, negligible percentage of the total time the meteorological station was operational, within acceptable ranges of protocols.
7. Overall, the meteorological station was active and collecting the required data. Access was provided to real-time data upon request. Wind sensors were visually checked during site visits. Lastly, the meteorological station data logger was used to determine wind direction during noise and odor complaint investigations.
8. Soil remediation at all three bioremediation farms (Vickers, LAI South & LAI North) was active in 2011. Odor suppressants were used during material loading and tilling of each of the farms. Culverts were cleared free of debris when necessary. Berms surrounding the farms were installed and maintained as necessary.
9. Reports show there were no tank vapor pressure exceedances that would cause any tanks to vent.
10. The accelerometer is installed and functioning. Per the CSD, readings from the accelerometer are recorded and transmitted in real-time to the Caltech Seismological Laboratory. No seismic events exceeding 13 percent of gravity occurred that would have required operations to cease.
11. Steve Rogers Acoustics conducted a review of the noise monitoring performed to date by Behrens & Associates, Inc. (B&A) during selected new well drills on the Inglewood Oil Field, to check for compliance with the drilling noise limits and noise monitoring requirements of the CSD. The revised report by Steve Rogers Acoustics, dated August 31, 2011, identified no noise exceedances resulting from drilling operations.
12. The Stocker 650RD 24-hour noise report by Behrens and Associates for August 21, 2011 to August 22, 2011 identifies no noise exceedances. Additionally, CSD compliance during Quiet Mode Drilling Hours was observed by MRS on January 25, 2012. MRS observed soundwalls in place, rubber matting on the V-door, and crew using walkie-talkies to communicate between the drill site and the mud storage area.
13. The pipe storage area was relocated from the southeast area of the oil field, near the main office, to the south-central part of the oil field, just east of Vickers bioremediation farm.
14. In compliance with AQMD Rule 1173, wells VIC1-124 and VIC1-11 were repaired by Avanti Environmental in the required time frame. Repairs were necessary due to hydrocarbon leaks greater than 500ppm but less than 10,000ppm.

15. The incident involving a reportable release (produced water) on February 25, 2012 was reported and investigated according to protocol. A majority of the release was captured by the stormwater basin. Preliminary investigation determined that the release was caused by external corrosion on a pipe. The pipe is a 6-inch trunk line, but was only feeding an idle well that was shut in at the time. The line was subsequently removed from service.

## FIELD AUDIT/COMPLIANCE STATUS

After the initial review of PXP's 2011 Annual EQAP Report (text and compliance matrix) by MRS on March 16, 2012, the two tables included after this report's conclusion were generated to guide the file and field reviews conducted at PXP on June 13, 2012. The *Notes* column shows the results of the file and field audit.

## RECOMMENDATIONS

1. *Ombudsperson: Add PXP's response time to written complaints log.*

During the audit, the ombudsperson's inquiry log showed an organized and detailed account of all inquiries lodged to PXP from the time of reporting to confirmed follow up. However, on several occasions, the log did not identify the time the response was provided. In order to comply and document the CSD requirement of a 1-hour response time, the response time should be recorded in the log for each occurrence (Section 22.44.14.J.3).

2. *Water Management Plan: Provide an updated plan consistent with the Recycled Water Report.*

The 2009 Water Management Plan was updated in 2011; however, inconsistencies with the Recycled Water Report, dated February 8, 2012, provided by Cardno Entrix, were found regarding the amount of water used for various infrastructure and maintenance needs at the oilfield. These inconsistencies need to be remedied.

Note that both of the above recommendations were brought into compliance after the file and field review conducted on June 13, 2012. PXP has added the time of response in the quarterly reports since the second quarter 2012. PXP has received approval to their Water Management Plan by Public Works in August 2012.

## CONCLUSION

The overall findings of the audit were positive, confirming PXP's compliance with the EQAP-related mitigation measures identified in the Baldwin Hills CSD.

<b>File Review</b>				
<i>Plans, Reports and Approvals (pages 4-5)</i>			<i>Item #</i>	<i>Notes</i>
1.	Odor Complaints	Verify number of complaints – 24; only counted 23 in complaints logs	n/a	Recount during file audit confirmed there were 23 odor complaints.
2.	Noise Complaints	Verify number of complaints – 15; only counted 13 in complaints log with one of those being vibrations	n/a	Recount during file audit confirmed there were 11 odor complaints.
3.	Emergency Flare AQMD Permit	Obtain approved permit	n/a	MRS has copy of approved permit on file.
4.	Annual Hazardous Materials Plan	Check plan/confirm submittal date	9	Submitted on 12-22-11. Obtained copy of transmittal.
5.	Annual Emergency Response & Spill Response Training	Confirm training	15	Obtained copy of Spill Response Containment Training attendance list.
6.	CAN System Annual Testing	Confirm test date	24b	12-22-11 test date. Obtained copy of test notification.
<i>4.2 Data Analyses Results (page 6)</i>			<i>Item #</i>	<i>Notes</i>
7.	Meteorological Station	Check annual data validation report/identify annual submittal month	n/a	Reviewed 2011 Annual Report by InterAct dated April 2012.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
8.	Ombudsperson	Check inquiry log and response timing	1a 16o 16s	Reviewed all four quarterly logs. PXP began implementing 2010 recommendation in 2 <sup>nd</sup> quarter of 2012.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
9.	Quiet Mode Drilling Procedures Training	Check training log	1c	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
10.	Quiet Mode Drilling	Confirm implementation	1d	Observed quiet mode drilling implementation during 1-25-12 site

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
	Implementation – Materials/Equipment			visit. See ‘Site Visit Observations’ section of the EQAP report for more details.
11.	Equipment Maint.	Check annual log	1f	Obtained copy of Ensign annual rig service log.
12.	Quiet Mode Drilling Plan Enforcement	Check acoustics engineering firm’s noise monitoring report	1n	Obtained copy of Behrens and Associates’ 24-hour report for 8-21-11 to 8-22-11 for Stocker 650RD well.
13.	Complaint Processing Procedure	Confirm and review one noise complaint procedure compliance	1o	C. Salway explained PXP’s internal procedure when receiving a complaint.
14.	Complaint Investigation and Resolution	Confirm and review one noise complaint investigation and resolution	1p	Reviewed quarterly logs. Additionally, MRS follows up with PXP regarding complaint resolution.
15.	DOGGR Permitting	Check NOI approvals	2g	Obtained copy of DOGGR permit for well VRU 4243 dated 12-9-10.
16.	Site Plan Review	Check approvals Inspect and retain copy of site plan	2h	Obtained copy of well BC 6751 site plan approval dated 2-24-11.
17.	Well Pad Construction Permitting	Check Site Specific Grading Permit(s) or confirm approval of Master Grading Plan showing required information	2j	Site specific permit not needed since Master Grading Plan shows required information. County reviews plan. None over 5,000 cubic yards.
18.	Gas Sensors (air monitoring)	Check log from three dates	6e	Visually inspected three log dates for well Stocker 650 RD1. Obtained copy of 11-16-11 calibration and testing report. Obtained copy of gas plant reports for three months (Oct – Dec). Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/27/11 & 5/11/11.
		Check 5-year data storage	6h.12	
		Check (re)calibration documentation; retain copy of calibration and testing report	6i.5	
		Check personnel training log	6i.10	
19.	Met Station	Check training log	25a	Obtained PXP Training Records Report that shows training dates for five employees: 1/17/11, 12/16/11 & 12/19/11.
		Check monthly analyses	25c	Compliance documented in met station annual audit report.
		Check sensor log from three dates	25e	
		Check (re)calibration documentation	25f	Obtained copy of test certificates. See PXP 11-9-11 email to Met One.
		Check 10-year data storage	25j	n/a
20.	Alarm Reports	Confirm no quarterly report necessary or check quarterly reports	6h.10, 6h.11,	Obtained copy of 2011 3 <sup>rd</sup> quarter report.

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
			6i.24	
21.	Annual Emergency Response Drills	Confirm drill date	7a	Obtained copy of 10/26/11 exercise sign off.
22.	Odor Minimization Plan	Confirm reviewed in 2011	16	Obtained 12-22-11 email from PXP to County stating no modifications to the plan necessary.
23.	Breakdown Report per Pressure Monitoring and Venting System for Crude Oil Tanks	Confirm submittal date & corrective action for 6/24 incident  Confirm 2010 audit recommendations implemented	16f	6-24-11 breakdown: Obtained filed report, AQMD notification and corrective action report.  See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
24.	Odor Awareness Training	Check training log	16j, 16k, 16l	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
25.	Accumulated Ground Movement Study	Check both submittals/confirm dates	19	Confirmed final submittal on 1/13/11.
26.	New Flare Permit	Obtain copy of permit (March 2011)	30	MRS has copy on file of SCAQMD permit to construct and temporary permit to operate, dated March 25, 2011 (permit actually issued on 3-24-11). SCAQMD is in the process of transferring all permits to construct issued since 1999 to permits to operate. Uncertain how long update process will take.  County Building Permits Issued: <ol style="list-style-type: none"> <li>1. 2-17-11: New foundation for flare knock-out vessel install.</li> <li>2. 9-29-11: Retaining wall re scrubber &amp; pump area.</li> <li>3. 10-31-11: New foundations to support flare. New muffler enclosure &amp; CMU block wall around flare structure.</li> <li>4. 1-10-12: Electrical installation for flare switch rack.</li> </ol>
27.	Dust Control Personnel Training	Check training log	34y	Obtained employee training log (one page) that shows three contractors with three separate companies and dates of training – 1/19/11 & 5/11/11.
28.	Ground Movement Survey	Confirm date of survey	37a	Obtained copy of 9-23-11 transmittal re survey. Obtained copy of 11-2-11 transmittal re addendum letter to the Fugro. Obtained copy of 3-1-12 transmittal re revised study final report.

<b>File Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
29.	Pre-Construction Biological Surveys	Confirm submitted to County	41b	Obtained 2011 Special Status Species Compliance Annual Report dated June 2012.
30.	Updated ERP for Biological Resources	Confirm how long updated approval lasts	42	Originally approved on 3-31-10 with expiration of 3-31-12; however, updated approval in January 2011.  On 5/25/12, PXP stated the expiration date indicates the time by which the plan has to be implemented. PXP confirmed this with the County.
31.	Cultural Resources Sensitivity Training	Check training log	43a	Obtained PXP Training Records Report that shows training date for one employee on 1/17/11.
32.	Landscaping, Visual Screening, Irrigation Plan	Check approval status of Phase II	44, 45	Phase II approved on 9-13-11 and completed on 6-12-12. Obtained copy of approval.
33.	Recycling Plan	Check training log	46e	Obtained PXP Training Records Report that shows training date for one employee on 1/17/11.
34.	Water Management Plan	Check status on approval	48	Obtained copy of plan revised in June 2011 and approved by County Public Works on 8-8-12. Obtained copy of recycled water analysis with revised date of 6-15-12. Plans are consistent with each other regarding water usage amounts.
35.	Unused/Abandoned Equipment Removal Plan (UAER Plan)	Check schedule for removal of out of service equipment	49, 50, 50a	All equipment has been removed. 5-26-09 submitted original plan. 2-9-11 approval. Obtained copies.
36.	SIMQAP	Check approval status	53	4-13-11 approval. Not posted on website, per John Peirson (sensitive information). Obtained copy of approval.
37.	Daily Inspections of Equipment and Safety Devices	Check logs, if available	54a 54b	Obtained copies of inspection sheets.
38.	Abandoned Well Testing	Check annual test records	60	Obtained copies of test reports dated 12-15-11 and 5-21-12.
39.	Equipment Service	Check log	67	Obtained copies of inspection sheets and work orders.

File Review				
Appendix A			Item #	Notes
	Log			
40.	Spill Prevention, Control and Countermeasure Plan (SPCCP)	Confirm January 2011 submittal	68	January 2011 submittal. Plan doesn't get approved, only inspected.
41.	Off-Road Diesel Construction Equipment Engines	Check copies of CARB certification	74	Obtained copies of 11-21-11 Tier 3 engine emissions data certification sheets.
42.	Noise & Vibration Monitoring	Check reports	80 116	See Table T-2 for information on 2010 EQAP Audit recommendation implementation status.
43.	New Tank Specifications	Check compliance docs	140	2 new water tanks: obtained construction worksheet sign-offs.
44.	Well and Production Reporting	Confirm filing on 1/30/12	144	Obtained 1-30-12 transmittal re 2011 well and production reporting.

Field Review				
Appendix A			Item #	Notes
1.	Signs	Confirm quiet mode signs posted at every drilling and re-drilling site	1c	Confirmed.
		Confirm post oil well identification signs posted	47	
		Confirm main entrance sign posted	8	
		Confirm perimeter identification signs posted	11, 11a, 12	
		Confirm speed limit signs posted (15 mph)	34a	
		Confirm no littering signs posted	35	
2.	Fencing	Confirm entire site fenced	109, 113	Confirmed.
3.	Air Monitoring stations	Check stations at drill/reworking site (2) & gas plant (4)	6c, 6d, 6i.3	Confirmed.
		Check settings	6h.3	
		Confirm wind sock installed	6i.1	

<b>Field Review</b>				
<i>Appendix A</i>			<i>Item #</i>	<i>Notes</i>
4.	Noise	Confirm compliance (floor & board pads only)	78, 80, 82, 90, 92, 94, 95, 116	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
5.	Belt Guards	Confirm compliance	124	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
6.	Single-Cellar Covers	Confirm compliance	111	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
7.	Machinery Enclosures	Confirm compliance	129	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
8.	Toilets and Wash Facilities	Confirm installed	106	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
9.	Hazardous Materials Storage	Check location and labeling	9a	None at drill sites during weekly site visits.
10.	Odor Suppressant	Confirm use at biofarms (3)	16a	Confirmation obtained during weekly site visits.
		Confirm use at drill site	16b	
11.	Portable Flare	Confirm installed at drill site	16c, 73	Confirmation obtained during weekly site visits since drilling discontinued for remainder of year.
12.	Met Station	Visually check wind sensors	25d	Confirmed.
13.	Eroded Hillside (n. of Stocker near La Brea)	Confirm completed or if scheduled	40c	Erosion control plan for hillside to be implemented in 2012.
14.	SIMQAP	Spot check equipment	53	Spot checked: workover equipment, two pump units, and gas plant air monitor.
15.	Landscaping	Confirm compliance	34s, 44	Confirmed.
16.	Landscaping Phase II	Confirm compliance	45b	Confirmed.
17.	New Flare	Confirm installation	31	Confirmed.
18.	Leaking Stuffing Box	Confirm tightened and corrected	n/a	Confirmed re wells VIC 1 124 & VIC 1 11.
19.	New Water Tanks	Confirm installation complete	n/a	Confirmed.

Drill Rig with Noise pads around the boards and rig floor



Drill Rig showing pads on V-door area and pipe lifting



Drill Rig Blowout Prevention Device



Drill Site – Mud Shakers



Drill Site – Wind Sock in front of Noise Barriers



Gas Plant: Old Flare (now removed) and New Flare While Under Construction



Drill Site – Sound Wall



Air Monitor at a Drilling Site



Gate 2 Signs



Drill Site Signs



Met Station – Wind Sensor



Met Station – Data Logger



Biofarm Vickers



Biofarm Vickers - Culvert



Biofarm LAI South – Culvert



Biofarm LAI North – Odorant System



Tank Monitoring Pressure Sensor on Tank 2



Tank Vapor Vent on Tank 2



**Permanent Noise Monitoring Equipment –Northwest Location**



**Permanent (Northeast Location) and Portable Noise Monitoring Equipment**



Watering Truck



Drill Site



Drill Site – Production Casing Rack

Drill Site – 100-Foot Noise Monitor



New Water Tanks



Erosion Control



Hillside Landscaping on La Brea Avenue



Basin

